

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

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AMBER NEDDO, as guardian and next friend  
to Z.N., C.B., A.B., and all others similarly  
situated,

Plaintiff,

v.

MONSANTO COMPANY, SOLUTIA INC.,  
and PHARMACIA LLC,

Defendants.

Case No. 2:23-cv-396-GWC

**STIPULATION REGARDING JURISDICTIONAL DISCOVERY AND BRIEFING ON  
DEFENDANTS' MOTION TO DISMISS**

Pursuant to the Court's Minute Order on May 20, 2024 (Doc. No. 35), Plaintiff Amber Neddo, as guardian and next friend to Z.N., C.B., and A.B., ("Plaintiff") and Defendants Monsanto Company, Solutia, Inc., and Pharmacia LLC ("Defendants") (together, the "parties"), by and through their attorneys, agree and stipulate as follows:

On January 30, 2024, Defendants filed a Motion to Dismiss Plaintiff's Complaint arguing Plaintiff's Complaint failed to plead personal jurisdiction and to state a claim under Vermont's medical-monitoring statute. (Doc. No. 27.) In response, on February 23, 2024, Plaintiff filed a Motion for Jurisdictional Discovery and Motion for Extension of Time to Respond to Defendants' Motion to Dismiss. (Doc. No. 28.) Defendants opposed jurisdictional discovery (Doc. No. 32), and this motion was fully briefed. On May 20, 2024, the Court granted Plaintiff's Motion for Jurisdictional Discovery and ordered the parties to file a stipulated schedule to conduct jurisdictional discovery as well as a briefing schedule on Defendants' Motion to Dismiss. (Doc. No. 35.) At the Court's direction, the parties subsequently met and conferred.

In light of the Court's ruling, for purposes of this case, Defendants consent to personal jurisdiction in this case and waive any right to contest personal jurisdiction in the future in this matter. In exchange, Plaintiff will not seek jurisdictional discovery from Defendants.

The parties further agree and stipulate that Plaintiff's opposition to Defendants' Rule 12(b)(6) Motion to Dismiss shall be due on or before July 3, 2024, and Defendants' reply brief in further support of Defendants' Motion to Dismiss shall be due on or before August 2, 2024.

Respectfully submitted,

Dated: May 24, 2024

/s/ J. Eli Wade-Scott

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/s/ Ian P. Carleton

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**IT IS SO ORDERED:**

Dated: 25 June, 2024.

A handwritten signature in black ink, appearing to read 'G. Crawford', written over a horizontal line.

Hon. Geoffrey W. Crawford  
United States District Court Judge